

Common Errors And Omissions

Based on past reviews of numerous applications for wastewater discharge permits, we have noted a number of common deficiencies. These omissions typically lead to 1) longer application processing times or rejections, 2) unnecessary permit modifications, and 3) the issuance of Notices of Violations (NOVs) and possible enforcement actions. Therefore, you should review your application against the following listing and correct any deficiencies prior to submission:

- ❑ **Auxiliary Discharges** – All types of wastewater discharges must be authorized by a DEP permit, including what many applicants would consider minor, clean or auxiliary discharges, or wastewaters that discharge infrequently. The following are some examples of wastewaters commonly omitted from permit applications:

Air Compressor Blowdown	Floor Drain Wastewaters
Air Compressor Condensate	Groundwater Remediation Wastewater
Air Conditioner Condensate	Hydrostatic Testing Water
Backflow Preventer Test Water	Industrial Laundry Wastewaters
Battery Wash Wastewaters	Laboratory Wastewaters
Boiler Blowdown/Cleaning Wastewaters	Non-contact Cooling Water (e.g. for process equipment/air conditioner)
Building Maintenance Wastewater	Non-destructive Test (NDT) or Zyglo Wastewaters
Concentrate Bath Regeneration Wastewater	Parts Stripping Wastewater
Contact Cooling & Heating Water	Photo Processing Wastewaters (Developer, Fixer, Rinses)
Cooling System Blowdown & Maintenance	Pump Seal Water
Cutting & Grinding Wastewater	Radiator Flush Wastewaters
Dewatering Wastewaters	Spill Containment Stormwater
Drum/Container Washout	Steam Cleaning and/or Powerwashing Wastewaters
Equipment/Parts Quench Waters	Steam Condensate
Filter Backwashes	Vehicle Service and/or Wash Wastewaters
Fire Sprinkler System Test Wastewater	Water Softener Backwashes and other Water Treatment Wastewaters

Unless discharges are authorized by another permit issued by this department (such as a general permit) all discharges must be included in your individual permit application.

- ❑ **Attachment O, Part B** – Analytical results are often not provided for each of the discharges included in the application, or analytical results are not provided for all parameters required per the instructions. In addition, applicants do not always indicate, as required, whether a substance is believed absent or known or suspected present. Please refer to Schedule A, pages 30-31 of the application instructions for an identification of parameters which must be tested. Note that the test requirements vary depending on the type of discharge.
- ❑ **Process Changes** – Applicants do not always perform a thorough review of process changes occurring since the issuance of their last permit. Such a review is needed to accurately complete Attachment O, Part B, and is required per item 2 of Attachment E as well as in Section 22a-430-3(i) of the Regulations of Connecticut State Agencies (RCSA), *Water Discharge Permit Regulations*. Be sure to discuss the changes in sufficient detail such that the review engineer will be able to understand what has occurred. Please also indicate whether the change was previously approved by DEP.
- ❑ **Attachment B** – Many applicants neglect to provide basic Applicant Background Information. To minimize this problem, the DEP has revised the application by including a form for Attachment B with required information to be submitted on the form.
- ❑ **Attachment M** – The line diagram and process flowchart provide a summary of water use throughout the facility, which are critical to our review. Oftentimes, these diagrams do not show internal or final discharge points, auxiliary discharges and points of chemical addition. Also, the flow balance frequently does not reconcile. Therefore, please be sure to pay attention to these details such that the DEP engineer may efficiently calculate permit limits and verify that all wastestreams are appropriately handled.

- ❑ **Flow Information** – Ideally, average and maximum daily flow information for all discharges should be based on the use of regularly calibrated flow meters capable of measuring, visually indicating and recording both instantaneous and total daily flow. However, for untreated discharges of less than 5,000 gallons per day (e.g., such as non-contact cooling water or fire sprinkler test wastewater) the DEP may accept flow information based on other reasonable methods such as the use of dedicated incoming water meters, a bucket and stop watch, maximum pump capacity, a pump rate or other generally accepted engineering practices.
- ❑ **Spill History** – Applicants often submit a certified *Spill Prevention and Control Plan Checklist* without the Spill Prevention and Control Plan. Although this is acceptable if the previous plan is representative of existing conditions and certified as such under Attachment E1, many applicants choosing this option neglect to submit a summary of recent spills. Unless there have been no spills since the preparation of the last application, a history of spills occurring over the last three years must be submitted with all applications for process water discharges. Therefore, please be sure to submit the spill history with your application. If no spills have occurred over the last three years, please include a statement to that effect.
- ❑ **Public Notice** – Applicants often neglect to publish notice of the permit application or to provide the DEP with a certified copy of the notice as it appeared in the newspaper. You must publish notice of the application immediately after you submit your application to the DEP unless the discharge is exempt from public notice pursuant to RCSA Section 22a-430-2, or the application is for a minor modification listed in RCSA Section 22a-430-4(p). You must then attach a certified copy of the published notice to a completed *Certification of Notice Form – Notice of Application* (DEP-APP-005A) and submit these documents to the DEP.

In addition to ensuring your application is complete, applicants could significantly shorten DEP review time, as well as overall processing time, by taking the following relatively simple steps:

- Correct effluent violations and/or problems before your permit is up for renewal. If the violations are not corrected, a detailed review and enforcement action may be needed to resolve the issue(s).
- Keep process wastewaters separate from domestic sewage and other non-process wastewaters where feasible. This will eliminate the need to consider dilution effects in establishing permit limits and conditions; also, it may enable the use of general permits for the auxiliary wastestreams.
- Notify DEP and get approval for treatment system changes or upgrades as soon as you know a modification is planned or needed.
- Notify DEP and get approval for process changes as required under RCSA Section 22a-430-3(i). Perform a thorough review of process changes occurring since issuance of the last permit and identify those changes in Attachment E of the permit application.
- Do not install floor drains unless absolutely needed and eliminate any existing floor drains if possible. Also, be sure to identify the discharge point of each floor drain.
- If you are proposing to move or expand operations, investigate whether discharge (e.g., sewer) capacity is available.
- If you plan to discharge to a municipal sewage treatment plant (POTW), contact the town or city early on in the process to solicit comments.
- If the application is for a permit renewal, apply at least 180 days before permit expiration.
- Recognize that certain changes proposed by applicants or their attorneys to draft permits (e.g., changes to “boiler plate” language) require legal reviews by the DEP. These are rarely approved. Therefore, please be selective in requesting changes.
- Discuss with DEP staff ahead of time any application information you feel may be confidential. It may not be necessary to submit the information. You should understand, however, that all information submitted as part of an application for a permit may be disclosed to any party. (Section 22a-430-3(b)(5) RCSA)
- Be prepared to discuss your recent spill history.
- Follow the application instructions when filling out the application, and
- Have someone from the company actively involved throughout the entire permit application process.

We hope these suggestions will be helpful to you in our ongoing efforts to further streamline the permitting process. Should you have any questions or comments, please contact our “Engineer of the Day” at 860-424-3018.